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ELECTRONICALLY FILED
June 2, 2014

6 Attorney for Debtors
7 ANTHONY THOMAS,
WENDI THOMAS and
8 AT EMERALD, LLC

9
10 UNITED STATES BANKRUPTCY COURT
11 DISTRICT OF NEVADA

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12 In Re:
13 ANTHONY THOMAS and
14 WENDI THOMAS,
15 AT EMERALD, LLC,

Case No. BK-N-14-50333-BTB
Case No. BK-N-14-50331-BTB

Chapter 11 Cases

[Jointly Administered]

16 **MOTION FOR EXTENSION OF**
17 **DEBTORS' EXCLUSIVE TIME**
18 **PERIODS TO FILE AND OBTAIN**
CONFIRMATION OF THEIR PLANS
OF REORGANIZATION

18 Debtors,

Hearing Date: July 30, 2014
Hearing Time: 10:00 a.m.

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20 _____ /
21 ANTHONY THOMAS, WENDI THOMAS and AT EMERALD, LLC, Debtors
22 above-captioned and hereinafter collectively referred to as "Debtors," by and through their
23 undersigned counsel, Holly E. Estes, Esq., of the Law Offices of Alan R. Smith, respectfully
24 represents as follows:

25 1. Debtors filed their respective voluntary petitions under Chapter 11 of the
26 United States Bankruptcy Code on March 4, 2014. The Debtors are currently operating as
27 debtors-in-possession.

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1 2. The 120-day period during which the Debtors may file plans of reorganization
2 expires on June 2, 2014. By this Motion, the Debtors request a 90-day extension of their
3 exclusivity period, to and including August 31, 2014. Debtors also seek a corresponding
4 extension of the time period to obtain confirmation of proposed plans of reorganization.

5 3. The 90-day extension of time requested herein is necessary. The Debtors are
6 in need of further time because they are awaiting the sale of their personal property, an
7 emerald with an estimated valued at over \$2,000,000.00. The Debtors' plans of
8 reorganization are dependant upon the sale of the emerald. The Debtors are currently in
9 contact with potential purchasers and require further time to negotiate the sale of the emerald.
10 Accordingly, the Debtors require further time to prepare adequate information and formulate
11 plans of reorganization. The Debtors are proceeding diligently in their efforts, and believe
12 they will be able to formulate acceptable plans of reorganization within the extension of time
13 requested herein.

14 4. The request set forth herein is Debtors' first request for an extension of time
15 in which to file plans. It is believed that an extension of 90-days to file the plans will be
16 necessary. Debtors would also request an extension of the exclusivity period to obtain
17 confirmation of their filed plans of reorganization. Section 1121(d) of the Bankruptcy Code
18 authorizes the Court to grant an extension of the exclusive time period for filing and
19 obtaining confirmation of a debtor's plan, assuming cause is shown therefor. Debtors believe
20 that cause is indicated.

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